

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Facebook, Inc.

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook, including any Instagram messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each account listed in Attachment A:

- a. All identity and contact information, including full name, e-mail address, physical address (including city, state, and zip code), date of birth, phone numbers, gender, hometown, occupation, and other personal identifiers;
- b. All past and current usernames associated with the account;
- c. The dates and times at which the account and profile were created, and the Internet Protocol (“IP”) address at the time of sign-up;
- d. All activity logs including IP logs and other documents showing the IP address, date, and time of each login to the account, as well as any other log file information;
- e. All information regarding the particular device or devices used to login to or access the account, including all device identifier information or cookie information, including all information about the particular device or devices used to access the account and the date and time of those accesses;
- f. All data and information associated with the profile page, including photographs, “bios,” and profile backgrounds and themes;
- g. All communications or other messages sent or received by the account;
- h. All user content created, uploaded, or shared by the account, including any comments made by the account on photographs or other content;
- i. All photographs and images in the user gallery for the account;
- j. All location data associated with the account, including geotags;
- k. All data and information that has been deleted by the user;

- l. A list of all of the people that the user follows on Instagram and all people who are following the user (*i.e.*, the user's "following" list and "followers" list), as well as any friends of the user;
- m. A list of all users that the account has "unfollowed" or blocked;
- n. All privacy and account settings;
- o. All records of Instagram searches performed by the account, including all past searches saved by the account;
- p. All information about connections between the account and third-party websites and applications; and,
- q. All records pertaining to communications between Facebook and Instagram and any person regarding the user or the user's Instagram account, including contacts with support services, and all records of actions taken, including suspensions of the account.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. §§ 2252, 2423 and 1470 involving Jeremy Cruz from May 1, 2017 through April 19, 2019, including, for each username identified on Attachment A, information pertaining to the following matters:

- (a) The possession, receipt, distribution, accessing with intent to view, and/or transportation of child pornography images or material involving the sexual exploitation of minors, constituting violations of 18 U.S.C. § 2252.
- (b) The transfer of obscene material to minors, constituting violations of 18 U.S.C. § 1470.
- (c) The transportation of a minor with intent to engage in criminal sexual activity, constituting violations of 18 U.S.C. § 2423.
- (d) Evidence indicating how and when the Instagram account was accessed or used, to determine the chronological and geographic context of account access, use, and

events relating to the crime under investigation and to the Instagram account owner;

- (e) Evidence indicating the Instagram account owner's state of mind as it relates to the crime under investigation;
- (f) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s).
- (g) The identity of the person(s) who communicated with the user ID about matters relating to violations of 18 U.S.C. §§ 2252, 2423 and 1470, including records that help reveal their whereabouts.
- (h) Any and all communication between Jeremy Cruz and M.C. and any communication between Jeremy Cruz and any other juvenile or apparent juvenile.
- (i) Any and all photos of Jeremy Cruz, M.C. or any other juvenile or apparent juvenile, other than Jeremy Cruz's children.